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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY -- NEWARK
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In re:

Hisue Parkinson

Chapter 13

Case No. 22-13373

Hon. Rosemary Gambardella

Debtor.
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**DEBTOR'S CERTIFICATION IN SUPPORT OF MOTION FOR BANKRUPTCY COURT
APPROVAL OF THE SALE OF DEBTOR'S REAL PROPERTY**

I, Hisue Parkinson, the above-named debtor make this certification in support of debtor's motion to approve the sale of real property located at 34 Clarke Avenue, Jersey City, NJ 07304 (the "Property") for the sale price of \$493,000.

1. A copy of the real estate sales contract (the "Contract") is attached to the certification of Nicholas Fitzgerald (hereinafter the "Fitzgerald cert.") at Exhibit A.

2. The proposed purchaser, Rashad Hanna, was obtained through an arm's length transaction.

3. I retained real estate broker, Steven Bell, of Boyne Realty, 303 Grove Street, Jersey City, New Jersey 07302 to obtain a buyer for the property. Mr. Bell is my real estate agent for

the sale and his firm will be paid a commission of 5.0% of the sale price (approximately \$24,650.00) for his work on the transaction. A copy of the listing agreement is annexed hereto as **Exhibit A**.

4. Participating broker, George Abdelmalak, of Cornerstone Home Realty, LLC, will share in an equal split of the above commission for his work on the transaction pursuant to the terms of the listing agreement.

5. I have also retained attorney, Dennis Callen, Attorney at Law to assist in the closing of this matter. Mr. Callen will receive a flat fee of \$1,800.00 for the transaction. My bankruptcy counsel is in the process of filing the necessary paperwork to have Mr. Callen's retention approved by the bankruptcy court.

6. My petition cites a value for the Property as \$430,000.00. However, in the current market condition, I was able to secure an offer of \$493,000. A copy of Schedule A/B of the petition is annexed hereto as **Exhibit B**.

7. I currently owe \$431,494.37 on my mortgage with Select Portfolio Servicing, Inc. (hereinafter "Select Portfolio"). A copy of the payoff statement is annexed to the certification of counsel (see Fitzgerald Cert at Exhibit B).

8. My attorney advises that the proposed order filed with this application provides for the payment of \$5,425.00 to the

Chapter 13 Trustee from the proceeds of the sale. I am also advised that this money will be paid regardless of whether or not there is enough money remaining from the sale to pay my full \$27,900 homestead exemption.

9. I understand that the trustee has filed an objection to the sale of my home and that she has requested that the court require all of the net proceeds to be distributed to her pending confirmation of my case. I am prepared to consent to the trustee receiving the entire net proceeds of the sale pending distribution under the terms of my plan in order to resolve this objection.

10. The sale of my home will allow me to pay off the mortgage on my home and satisfy the terms of my bankruptcy plan.

11. The court's approval of this sale will allow me to make a clean exit from the property and satisfy the creditors identified in my bankruptcy petition in accordance with the terms of my Chapter 13 Plan.

I certify that the statements made by me are true. If any of the above statements are willfully false, I understand that I am subject to punishment.

Dated: May 9, 2022


Hisue Parkinson